

Connect First, Inc.

Robocall Mitigation Plan

Connect First, Inc. ("Connect First") is committed to minimizing the number of robocalls that originate on its network and preventing unwanted robocalls from reaching end users. As of the date of filing this plan, Connect First does not provide voice calling services to wholesale or retail customers. Should Connect First provide voice services, it commits to following this Robocall Mitigation Plan ("the Plan").

Know Your Customer Procedures.

Connect First is no longer onboarding new customers. Connect First requires existing customers to provide and maintain accurate information, including legal name and contact details, and to update and verify this information as needed. As described below, Connect First continuously monitors its network for suspicious activity.

Know Your Upstream Provider Procedures

Connect First will contract with respected upstream providers and shall require those providers to offer service in compliance with all applicable laws and regulations, including but not limited to the laws and regulations related to robocalling.

Connect First will only accept traffic from immediate upstream providers that are listed in the Robocall Mitigation Database and will not knowingly accept traffic from providers who are not listed in the Robocall Mitigation Database.

Customer Compliance with Robocalling Rules and Existing Law.

Connect First will require end customers to use RingCentral services in compliance with the law and prohibits, among other things, illegal call spoofing, fraud, and use of automatic or predictive dialing without the called party's prior consent.

Active Monitoring of Network for Fraud

Connect First will monitor its network for suspicious calling patterns; promptly investigate any alerts related to illegal, abusive, or otherwise unacceptable behavior; and apply consistent processes and standards to any allegations of service abuse and act fairly and transparently toward our customers. After investigation, Connect First will make a determination of the appropriate action, which may include denial of service, suspension of service, termination of service, and no action. Connect First will be able to immediately impose its action upon customers without any delay.

Full and Timely Compliance with Traceback Requests

Connect First will respond to traceback requests within 24 hours of receiving the request, as required by the Federal Communications Commission rules. Connect First will require all

resellers and upstream providers to comply with all traceback efforts, whether initiated by the Federal Communications Commission, the designated Industry Traceback Group, law enforcement, or by any other applicable voice service provider or interested party.

When a traceback request is made or any other credible complaint brought to its attention, Connect First will promptly investigate the suspect traffic to determine the call path(s) and whether the traffic is likely to be illegal robocalling. If the traffic is deemed highly likely to be illegal, Connect First will take appropriate steps to ensure that the suspicious traffic does not continue, including terminating the caller's access to Connect First's network.

STIR/SHAKEN Implementation.

Connect First has implemented STIR/SHAKEN on its IP-networks. Should Connect First sign calls, it will sign the calls in accordance with relevant ATIS standards.

Affiliates

Connect First is wholly owned by voice service provider RingCentral, Inc. ("RingCentral"). RingCentral is a publicly traded corporation. Both Vlad Shumnis and Vlad Vendrow own more than 10% of RingCentral stock. In addition, Mr. Shumnis is RingCentral's Chief Executive Officer and manages and controls RingCentral's businesses.

RingCentral also wholly owns voice service providers RCLEC, Inc. and RingCentral MiCloud & Sky, LLC. RingCentral, RCLEC, Inc., and RingCentral MiCloud & Sky, LLC are listed in the Robocall Mitigation Database and have published a Robocall Mitigation Plan.

Neither RingCentral, RCLEC, Connect First, RingCentral MiCloud & Sky, Mr. Vendrow, nor Mr. Shumnis have been subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.